

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BERNARDUS HENRICUS FUNNEKOTTER  
*et al.*,

Plaintiffs,

-against-

AGRICULTURAL DEVELOPMENT BANK  
OF ZIMBABWE, MINERALS MARKETING  
CORPORATION OF ZIMBABWE, ZB  
BANK LIMITED, ZIMBABWE MINING  
DEVELOPMENT CORPORATION, ZIMRE  
HOLDINGS LIMITED and REPUBLIC OF  
ZIMBABWE,

Defendants.

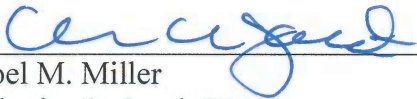
13 Civ. 1917 (CM)

**NOTICE OF MOTION FOR  
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated July 21, 2015, together with the Declaration of Charles R. Jacob III, dated July 21, 2015, and the exhibits thereto, and Plaintiffs' Rule 56.1 Statement of Undisputed Material Facts, dated July 21, 2015, and upon all prior proceedings in this action, Plaintiffs will move this Court, in Room 17C of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, before the Honorable Colleen McMahon, at a time to be designated by the Court, for an order pursuant to Fed. R. Civ. P. 56, granting summary judgment against Defendants Agricultural Development Bank of Zimbabwe, Minerals Marketing Corporation of Zimbabwe, Zimbabwe Mining Development Corporation, and Zimre Holdings Limited (together, the "Non-ZB Bank Defendants"), entering judgment against the Non-ZB Bank Defendants in the form attached hereto, and granting such other relief as may be just and proper.

Dated: July 21, 2015

MILLER & WRUBEL P.C.

By: 

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